

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL , DEFENDANTS

12-CV-5726
Jury TRIAL DEMANDED

MOTION TO COMPEL FURTHER RESPONSES TO INTERROGATORIES PURSUANT TO
FRCP 33(B), 37 (A)

Pusuant to Fed. R.Civ.P 33, 34, and 37 , Plaintiff Jo Ann Fonzone aka Judy Mc Grath moves this court for an order compelling Defendants Kesielewski, Bee, Kovacs, Ortiz, and all non-parties represented by defense counsel to answer fully, accurately and completely the disputed interrogatories in Plaintiff's Interrogatories and Interrogatories by written depositions as more fully explained as follows:

Plaintiff's Interrogatories were narrowly tailored to ferret out basic facts supporting the allegations in the Complaint . Interrogatories of this type are permitted and can be an effective means of testing the accuracy of a parties contentions and narrowing the issues for trial.

Defendants Kesielewski, Bee, Kovacs, and Ortiz objected to every question and provided no answers to Plaintiff's interrogatories. Defendants responses entirely lack responsive content ; and it is questionable whether they themselves answered them at all as they were not notarized.

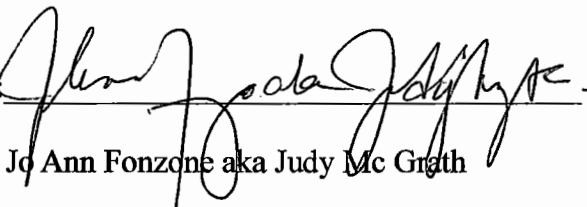
The Interrogatoies of the defendants mentioned in the preceding paragraph were served in May 2016, grossly exceeding the 30 day limitation in which to answer ; they had more than enough time to provide sufficient answers. These defendants are not cooperating and are in violation of the Federal Discovery Rules.

Interrogatories by written depositions to non-parties since June 2016 were not answered at all , thereby thwarting and sabotaging Plaintiff's efforts to proceed with the Discovery process and obtain information .

WHEREFORE , Plaintiff respectfully requests that this court issue an order compelling Defendants to respond fully to the Interrogatories , and awarding Plaintiff reasonable costs, including attorneys' fees incurred in connection with this motion.

Date: August 9, 2016

Refiled: 2/16/18

By: 
Jo Ann Fonzone aka Judy Mc Grath